

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

Albert L. Fisher, M.D.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	Case No. 1:13-cv-00152-WCG
	)	Honorable William C. Griesbach
Aurora Health Care, Inc.,	)	
	)	
Defendant.	)	
	)	

**DECLARATION OF CHERYL BORGARDT**

I, Cheryl Borgardt, hereby declare as follows:

1. I am over the age of twenty-one years and am competent to testify as to the matters stated herein. Based on my personal knowledge and experience at AMCO (as defined below), and my review of records kept and maintained by AMCO in the ordinary course of business, and made at or near the time of the transactions at issue by a person with knowledge of the matters contained therein, the matters below are true and correct to the best of my knowledge.

2. I am employed as the Medical Staff Services Coordinator at Aurora Medical Center – Oshkosh (“AMCO”). As part of my employment, I have access to and knowledge of medical staff application materials, the bylaws of the medical staff at AMCO, and various policies governing the medical practices of the medical staff at AMCO. Based on my knowledge, the routine practice in the ordinary course of business was and is that files containing records such as the documents attached hereto as Exhibits A, B, and C were created and are maintained by personnel with responsibility for doing so, and that the documents referenced below and attached as exhibits were and are kept and maintained in such files, beginning at or

near the time they were sent or received and continuing to this day, all in the regular course of business activity.

3. Attached hereto as Exhibit A is a true and correct redacted copy of the reappointment application for staff privileges at AMCO submitted by Dr. Albert L. Fisher in 2011.

4. Attached hereto as Exhibit B is a true and correct copy of the Medical Staff Bylaws for AMCO that were in effect at the time of Dr. Albert L. Fisher's staff reappointment application in 2011.

5. Attached hereto as Exhibit C is a true and correct copy of the Medical Staff Policy Governing Medical Practices relating to Admission, Transfer and Discharge of Patients that was in effect at the time of Dr. Albert L. Fisher's staff reappointment application in 2011.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed at Oshkosh, Wisconsin this 29th day of March, 2013.

/s/ Cheryl Borgardt  
Cheryl Borgardt